

THIERMAN BUCK, LLP  
7287 Lakeside Drive  
Reno, NV 89511  
(775) 284-1500 Fax (775) 703-5027  
Email: info@thiermanbuck.com; www.thiermanbuck.com

**THIERMAN BUCK, LLP**

Mark R. Thierman, Nev. Bar No. 8285  
mark@thiermanbuck.com  
Joshua D. Buck, Nev. Bar No. 12187  
josh@thiermanbuck.com  
Leah L. Jones, Nev. Bar No. 13161  
leah@thiermanbuck.com  
7287 Lakeside Drive  
Reno, Nevada 89511  
Tel. (775) 284-1500  
Fax. (775) 703-5027

*Attorneys for Plaintiffs*

**JACKSON LEWIS**

Paul T. Trimmer, Nev. Bar No. 9291  
Email: trimmerp@jacksonlewis.com  
3800 Howard Hughes Pkwy., Suite 600  
Las Vegas, NV 89169  
Tel: (702) 921-2460

Veronica T. von Grabow, *admitted pro hac vice*  
Veronica.vonGrabow@jacksonlewis.com  
950 17<sup>th</sup> Street, Suite 2600  
Denver, CO 80202  
Tel: (303) 225-2419

*Attorneys for Defendant Customer Connexx  
LLC; ARCA, INC.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

CARIENE CADENA and ANDREW  
GONZALES, on behalf of themselves  
and all others similarly situated,

Plaintiffs,

vs.

CUSTOMER CONNEXX LLC; ARCA,  
INC.; and DOES 1 through 50, inclusive,

Defendants.

Case No. 2:18-cv-00233-APG-DJA

**STIPULATION FOR ENLARGEMENT  
OF TIME FOR RESPONSES AND  
ORDER THEREON**

**(First Request)**

Plaintiffs CARIENE CADENA and ANDREW GONZALES (“Plaintiffs”), by and through their counsel of record THIERMAN BUCK, LLP, and Defendants CUSTOMER CONNEXX LLC and ARCA, INC.<sup>1</sup>, by and through their counsel of record, JACKSON LEWIS, P.C., (collectively, “the Parties”) hereby request, stipulate, and agree to extend the time for both Parties to file their respective responses as set forth below.

<sup>1</sup> Plaintiffs filed their Motion for leave to file a second amended complaint to add Defendant JanOne Inc. as a party defendant. ECF No. 72. Defendants filed a motion of non-opposition on October 23, 2020. ECF No. 76.

1 This stipulation is submitted in compliance with LR IA 6-1. The Parties are requesting  
 2 these extensions due to the volume of motions pending, the complexity and fact intensive nature  
 3 of the responsive pleadings, counsels' professional commitments, existing workload, and  
 4 challenges of working remotely due to the COVID-19 crisis, including slower connectivity,  
 5 communications delays, and obtaining records necessary to the motions. Good cause exists for  
 6 the requested extensions.

7 Accordingly, the Parties further stipulate and agree to extend the deadlines as follows:

8 1) Plaintiffs' Opposition to Defendants' Motion to Decertify Collective Action (ECF  
 9 No. 80) currently due 11/10/20 shall be extended seven (7) days to on or before **Tuesday,**  
 10 **November 17, 2020.** Defendant's Reply In Support Of shall be due fourteen (14) calendar days  
 11 after the filing of Plaintiffs' Opposition.

12 2) Plaintiffs' Opposition to Defendant, Customer Connexx's Motion for Summary  
 13 Judgment (ECF No. 78) currently due 11/16/20 shall be extended nine (9) days to on or before  
 14 **Wednesday November 25, 2020.** Defendant's Reply In Support Of shall be due fourteen (14)  
 15 calendar days after the filing of Plaintiffs' Opposition.

16 3) Plaintiffs' Opposition to Defendant, ARCA Inc.'s Motion for Summary Judgment  
 17 (ECF No. 79) currently due 11/16/20 shall be extended nine (9) days to on or before **Wednesday**  
 18 **November 25, 2020.** Defendant's Reply In Support Of shall be due fourteen (14) calendar days  
 19 after the filing of Plaintiffs' Opposition.

20 ///

21 ///

22 ///

23

24

25

26

27

28

4) Defendants' Opposition to Plaintiffs' Motion to Certify Class Pursuant to Rule 23 (ECF No. 77, refiled as ECF No. 81), currently due 11/11/20 shall be extended seven (7) calendar days to on or before **Wednesday, November 18, 2020**. Plaintiffs' Reply shall be due fourteen (14) calendar days after the filing of Defendants' Opposition.

Dated: October 29, 2020

THIERMAN BUCK, LLP

/s/ Leah L Jones

Mark R. Thierman, Nev. Bar No. 8285  
Joshua D. Buck, Nev. Bar No. 12187  
Leah L. Jones, Nev. Bar No. 13161  
7287 Lakeside Drive  
Reno, Nevada 89511  
*Attorneys for Plaintiffs*

Dated: October 29, 2020

JACKSON LEWIS

/s/ Veronica T. von Grabow

Paul T. Trimmer, Nev. Bar No. 9291  
Email: trimmerp@jacksonlewis.com  
3800 Howard Hughes Pkwy., Suite 600  
Las Vegas, NV 89169  
Tel: (702) 921-2460

Veronica T. von Grabow, *admitted pro hac vice*

Veronica.vonGrabow@jacksonlewis.com  
950 17<sup>th</sup> Street, Suite 2600  
Denver, CO 80202  
Tel: (303) 225-2419  
*Attorneys for Defendants*

**ORDER**

**IT IS SO ORDERED.**

Dated this 29th day of October 2020.



UNITED STATES DISTRICT JUDGE

THIERMAN BUCK, LLP

7287 Lakeside Drive

Reno, NV 89511

(775) 284-1500 Fax (775) 703-5027

Email: info@thiermanbuck.com; www.thiermanbuck.com